

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette, Craig Lassig, Katie Nelson, Tannen Maury, Stephen Maturen, and The Communications Workers of America, *On behalf of themselves and other similarly situated individuals,*

Court File No. 20-cv-01302
(WMW/DTS)

Plaintiffs,

v.

City of Minneapolis; Minneapolis Chief of Police Medaria Arradondo *in his individual and official capacity*; Minneapolis Police Lieutenant Robert Kroll, *in his individual and official capacity*; Minnesota Department of Public Safety Commissioner John Harrington, *in his individual and official capacity*; Minnesota State Patrol Colonel Matthew Langer, *in his individual and official capacity*; and John Does 1-4, *in their individual and official capacities,*

Defendants.

PLAINTIFFS' AMENDED EXHIBIT LIST

| PRESIDING JUDGE | | | | | PLAINTIFF'S ATTORNEY | DEFENDANT'S ATTORNEY |
|----------------------|----------|--------------|--------|----------|--|----------------------|
| Wilhelmina M. Wright | | | | | | |
| TRIAL DATE (S) | | | | | COURT REPORTER | COURTROOM DEPUTY |
| July 28, 2021 | | | | | | |
| PLF. NO. | DEF. NO. | DATE OFFERED | MARKED | ADMITTED | DESCRIPTION OF EXHIBITS* AND WITNESSES | |
| 1. | | | | | Photograph taken by Chris Tuite [Plaintiffs000211] | |
| 2. | | | | | Excerpt from video taken by Jon Farina [Plaintiffs000367] | |
| 3. | | | | | April 14, 2021 Instagram post by Chris Tuite [Plaintiffs000245 – 55] | |

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| 4. | | | | | April 17, 2021 Instagram post by Chris Tuite [Plaintiffs000289 – 99] |
| 5. | | | | | Photograph of Chris Tuite [StateDef0000148] |
| 6. | | | | | Photograph of Chris Tuite’s press credential and driver’s license (STATEDEF0000149 / CONFIDENTIAL) |
| 7. | | | | | Clip of Ed Ou video taken on May 30, 2020, Minneapolis. [PLAINTIFF000301] |
| 8. | | | | | Ed Ou video taken on April 13, 2021, Brooklyn Center. [PLAINTIFF000097] |
| 9. | | | | | Color photograph of Ed Ou’s mask. [PLAINTIFF000300] |
| 10. | | | | | Color photograph of Ed Ou. [PLAINTIFF000098] |
| 11. | | | | | Color photograph of Ed Ou. [PLAINTIFF000106] |
| 12. | | | | | Color photograph of Ed Ou. [PLAINTIFF000302] |
| 13. | | | | | Ed Ou Tweet dated June 2, 2020 [Plaintiffs000368]: https://twitter.com/edouphoto/status/1267981849537609728?s=20 |
| 14. | | | | | Long Ed Ou video taken on May 30, 2020 [Plaintiffs000370]. https://drive.google.com/file/d/1Wm5B7XOAUrJcGsex3vgVk_zEFz1cfpiq/view?usp=sharing |
| 15. | | | | | The Office of Internal Affairs memo dated December 29, 2020 re: Complaint. [STATEDEF0000635 – 636 / AEO] |
| 16. | | | | | Department of Public Safety Formal Complaint dated April 19, 2021. [STATEDEF0000699 / AEO] |
| 17. | | | | | City of Minneapolis Complaint. [STATEDEF0000704 – 705 / AEO] |
| 18. | | | | | Department of Public Safety Formal Complaint dated June 19, 2020. [STATEDEF0000706 / AEO] |
| 19. | | | | | Department of Public Safety Statement dated September 4, 2020. [STATEDEF0000710 – 719 / AEO] |
| 20. | | | | | Email chain regarding Complaint. [STATEDEF0000723 – 726 / AEO] |
| 21. | | | | | Department of Public Safety Formal Complaint. [STATEDEF0000729 – 738 / AEO] |
| 22. | | | | | Email chain regarding Complaint. [STATEDEF0000739 – 740 / AEO] |

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| 23. | | | | | Email from Leita Walker to Paul Schnell, John Harrington and Matthew Langer re: Letter from Media Regarding Law Enforcement with attachment. [DOC0000005] |
| 24. | | | | | Email chain between Leita Walker and Paul Schnell regarding Carolyn Sung Questions. [DOC0000008] |
| 25. | | | | | Email chain between Leita Walker and Paul Schnell regarding Follow-up. [DOC0000014] |
| 26. | | | | | Email from Leita Walker to Paul Schnell regarding Vice Media Journalist Arrests with attachment. [DOC0000017] |
| 27. | | | | | Email chain between Matt Sokol and Melissa Eberhart dated April 17, 2021 regarding TRO. [STATEDEF0000015 – 16] |
| 28. | | | | | Email between Liz Kramer and Karl Procaccini dated April 17, 2021 regarding Fed. Cr. TRO – For Distribution to Operation Safety Net. [STATEDEF0000043 – 44] |
| 29. | | | | | Email from Melissa Eberhart dated April 17, 2021 re: Statement from Minnesota State Patrol on Recent Temporary Restraining Order. [STATEDEF0000066 – 68] |
| 30. | | | | | Email chain with Bruce Gordon dated April 16, 2021 regarding TRO. [STATEDEF0000069 – 70] |
| 31. | | | | | Email chain dated April 19, 2021 regarding Leita Walker – Follow-up on Letter. [STATEDEF0000411 – 412 / AEO] |
| 32. | | | | | Letter from Leita Walker dated April 17, 2021. [STATEDEF0000432 – 440 / AEO] |
| 33. | | | | | Email chain between Bruce Gordon and John Elder dated April 6, 2021 regarding Very Rough Draft of Invitation. [STATEDEF0000506] |
| 34. | | | | | Email chain dated September 30, 2020 regarding Complaint. [STATEDEF0000682 – 686 / AEO] |
| 35. | | | | | Declaration of Bruce Gordon (with exhibits). |
| 36. | | | | | Declaration of John Harrington. |
| 37. | | | | | Declaration of Joseph Dwyer (with exhibits – some AEO). |
| 38. | | | | | Declaration of Kathryn Landrum (with exhibits). |
| 39. | | | | | Declaration of Colonel Matthew Langer. |

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| 40. | | | | | Declaration of Lieutenant Colonel Rochelle Schrofer. |
| 41. | | | | | Schrofer Declaration Exhibit 1 [000001 – 000004]. |
| 42. | | | | | Minnesota State Patrol Investigation Notes. [STATEDEF0000526] |
| 43. | | | | | Department of Public Safety Statement dated December 16, 2020. [STATEDEF0000541 – 550 / AEO] |
| 44. | | | | | Minnesota State Patrol Field Report dated June 17, 2020. [STATEDEF0000555 – 560 / AEO] |
| 45. | | | | | Department of Public Safety Statement dated January 14, 2021. [STATEDEF0000569 – 574 / AEO] |
| 46. | | | | | Minnesota State Patrol Field Report dated May 28, 2020. [STATEDEF0000587 – 592 / AEO] |
| 47. | | | | | Department of Public Safety Statement dated December 22, 2020. [STATEDEF0000624 – 628 / AEO] |
| 48. | | | | | Department of Public Safety Statement dated January 21, 2021. [STATEDEF0000637 – 645 / AEO] |
| 49. | | | | | Department of Public Safety Statement dated December 22, 2020. [STATEDEF0000654 – 659 / AEO] |
| 50. | | | | | Department of Public Safety Statement dated December 3, 2020. [STATEDEF0000661 – 671 / AEO] |
| 51. | | | | | Department of Public Safety Statement dated December 22, 2020. [STATEDEF0000693 – 698 / AEO] |
| 52. | | | | | The Office of Internal Affairs memo dated April 20, 2021. [STATEDEF0000727 – 728 / AEO] |
| 53. | | | | | Minnesota State Patrol Policy regarding Media – Requests and Information. [STATEDEF0000743 – 744] |
| 54. | | | | | Minnesota Department of Public Safety Administrative Policy regarding Media. [STATEDEF0000745 – 747] |
| 55. | | | | | Emergency Executive Order 20-65 [Plaintiffs000378]. |

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| 56. | | | | | Media Photograph dated April 16, 2021. [STATEDEF0000091] |
| 57. | | | | | Media Photograph dated April 16, 2021. [STATEDEF0000092] |
| 58. | | | | | Media Photograph dated April 16, 2021. [STATEDEF0000093 / Confidential] |
| 59. | | | | | Media Photograph dated April 16, 2021. [STATEDEF0000094] |
| 60. | | | | | Media Photograph dated April 16, 2021. [STATEDEF0000095] |
| 61. | | | | | Department of Public Safety Statement dated January 6, 2021. [STATEDEF0000512 – 520 / AEO] |
| 62. | | | | | Emergency Executive Order 21-18 [Plaintiffs000379]. |
| 63. | | | | | Complaint dated May 25, 2021. |
| 64. | | | | | Ryan Raiche Video [Plaintiffs000375]: https://www.facebook.com/RyanRaiche/videos/2882143978738897/ |
| 65. | | | | | Carlos Gonzalez April 12, 2021 Video [Plaintiffs000371]: https://twitter.com/CarlosGphoto/status/1381794769182023682 |
| 66. | | | | | Harry Colbert April 14, 2021 Video [Plaintiffs000372]: https://www.facebook.com/harry.colbert/videos/10159284117185135/?d=n |
| 67. | | | | | Unicorn Riot April 14, 2021 Video [Plaintiffs000373]: https://unicornriot.ninja/2021/police-break-equipment-shoot-beat-and-detain-press/ |
| 68. | | | | | Omar Jimenez May 29, 2020 Video [Plaintiffs000374]: https://www.youtube.com/watch?v=ftLzQefpBvM |
| 69. | | | | | Tom Aviles's May 20, 2020 Video [Plaintiffs000376]: https://minnesota.cbslocal.com/2020/05/30/wcco-photojournalist-tom-aviles-arrested-in-south-minneapolis/ |
| 70. | | | | | Unicorn Riot April 13, 2020 Video [Plaintiffs000377]: https://youtu.be/BIQP0qEmOW8 |

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| 71. | | | | | Background on Draft Model Policy on Public Assembly / First Amendment Activity from July 22, 2021 POST Board Meeting. |

Dated: July 27, 2021

/s/ *Pari I. McGarraugh*

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